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**From:** Saunders, Jennifer [Saunders.Jennifer@epa.gov]  
**Sent:** 4/7/2022 10:17:28 AM  
**To:** Wentte, Stephen [Wentte.Stephen@epa.gov]; Fertich, Elizabeth [fertich.elizabeth@epa.gov]; Rate, Debra [Rate.Debra@epa.gov]; Johnson, Marion [Johnson.Marion@epa.gov]; Savoia, Pete [Savoia.Pete@epa.gov]; Britton, Wade [Britton.Wade@epa.gov]; Sankula, Sujatha [Sankula.Sujatha@epa.gov]; Orrick, Greg [Orrick.Greg@epa.gov]; Khan, Faruque [Khan.Faruque@epa.gov]; Louie-Juzwiak, Rosanna [Louie-Juzwiak.Rosanna@epa.gov]; Dunbar, Anwar [Dunbar.Anwar@epa.gov]; Blankinship, Amy [Blankinship.Amy@epa.gov]; Milians, Karen [Milians.Karen@epa.gov]; Farruggia, Frank [Farruggia.Frank@epa.gov]  
**CC:** Bohaty, Rochelle [Bohaty.Rochelle@epa.gov]; Bloem, Thomas [Bloem.Thomas@epa.gov]; Yang, Yung [Yang.Yung@epa.gov]; Hawkins, Monica [Hawkins.Monica@epa.gov]; Cain, Tamica [Cain.Tamica@epa.gov]; Gardner, David [Gardner.David@epa.gov]  
**Subject:** RE: Discuss PFAS OD briefing for PQZ and Broflanilide

Hi all, thanks for the discussion on Tuesday and the info in the email thread, it'll help us get the slide deck outline moving. We'll put in some kind of placeholder so EFED/HED can capture information like what's described in the email below/other uncertainties, but obviously please add in any slides you see fit to help upper management make their decisions.

While it might not take long to add slides about the current databases of the two actives, we figure you'll all want to confer with your divisions on your final thoughts related to the PFAS question, so we'll schedule our next meeting to go over the slides during the first week of May.

You can also reach out to Jeff Dawson if you'd like to talk through anything related to PFAS. We can add him as optional to the next meeting.

Thanks!

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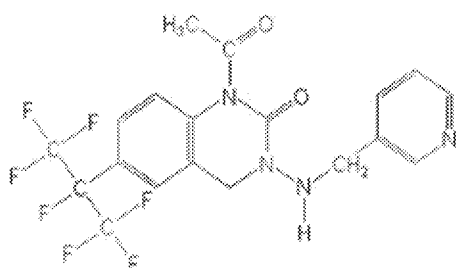
**From:** Wentte, Stephen <Wentte.Stephen@epa.gov>  
**Sent:** Tuesday, April 5, 2022 3:36 PM  
**To:** Fertich, Elizabeth <fertich.elizabeth@epa.gov>; Saunders, Jennifer <Saunders.Jennifer@epa.gov>; Rate, Debra <Rate.Debra@epa.gov>; Johnson, Marion <Johnson.Marion@epa.gov>; Savoia, Pete <Savoia.Pete@epa.gov>; Britton, Wade <Britton.Wade@epa.gov>; Sankula, Sujatha <Sankula.Sujatha@epa.gov>; Orrick, Greg <Orrick.Greg@epa.gov>; Khan, Faruque <Khan.Faruque@epa.gov>; Louie-Juzwiak, Rosanna <Louie-Juzwiak.Rosanna@epa.gov>; Dunbar, Anwar <Dunbar.Anwar@epa.gov>; Blankinship, Amy <Blankinship.Amy@epa.gov>; Milians, Karen <Milians.Karen@epa.gov>; Farruggia, Frank <Farruggia.Frank@epa.gov>  
**Cc:** Bohaty, Rochelle <Bohaty.Rochelle@epa.gov>; Bloem, Thomas <Bloem.Thomas@epa.gov>; Yang, Yung <Yang.Yung@epa.gov>; Hawkins, Monica <Hawkins.Monica@epa.gov>; Cain, Tamica <Cain.Tamica@epa.gov>; Gardner, David <Gardner.David@epa.gov>  
**Subject:** RE: Discuss PFAS OD briefing for PQZ and Broflanilide

The email chain below discusses the points that were made about PQZ breaking down, but the PFAS side chain of the chemical potentially sticking around.

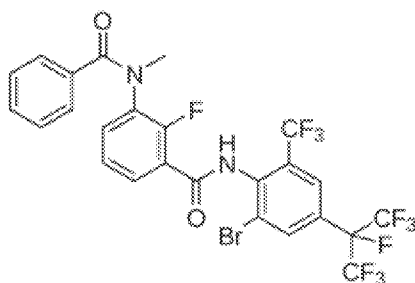
**From:** Wentte, Stephen  
**Sent:** Friday, March 25, 2022 11:56 AM  
**To:** Bohaty, Rochelle [Bohaty.Rochelle@epa.gov](mailto:Bohaty.Rochelle@epa.gov)  
**Cc:** Milians, Karen [Milians.Karen@epa.gov](mailto:Milians.Karen@epa.gov); Federoff, Nicholas [Federoff.Nicholas@epa.gov](mailto:Federoff.Nicholas@epa.gov)  
**Subject:** RE: Quick question re: pyrifluquinazon

## Ex. 5 Deliberative Process (DP)

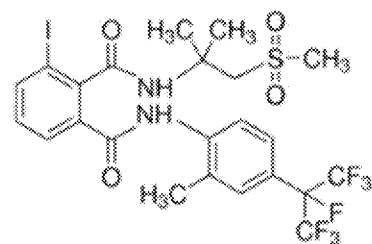
# Ex. 5 Deliberative Process (DP)



Pyrfluquinazon



Broflanilide



Flubendiamide

de

## PFAS OPPT vs. OECD definitions

- OPPT PFAS working definition for TSCA purposes:
  - $\text{CF}_2\text{R}-\text{CFR}'\text{R}''$  where  $\text{R}, \text{R}', \text{R}''$  do not equal  $\text{H}$
- Newly revised OECD PFAS definition<sup>1/</sup>
  - PFASs are defined as fluorinated substances that contain at least one fully fluorinated methyl or methylene carbon atom (without any  $\text{H}/\text{Cl}/\text{Br}/\text{I}$  atom attached to it), i.e., with a few noted exceptions, any chemical with at least a perfluorinated methyl group ( $-\text{CF}_3$ ) or a perfluorinated methylene group ( $-(\text{CF}_2)-$ ) is a PFAS.
- Pyrfluquinazon chemical structure includes a  $\text{CF}_3-\text{CF}(\text{R})-\text{CF}_3$  moiety, and as such meets both the OPPT and newly revised OECD definition of a PFAS

<sup>1/</sup>Reconciling Terminology of the Universe of Per- and Polyfluoroalkyl Substances: Recommendations and Practical Guidance (July 9, 2021)

**From:** Bohaty, Rochelle <[Bohaty.Rochelle@epa.gov](mailto:Bohaty.Rochelle@epa.gov)>  
**Sent:** Wednesday, March 9, 2022 1:39 PM  
**To:** Wente, Stephen <[Wente.Stephen@epa.gov](mailto:Wente.Stephen@epa.gov)>  
**Cc:** Milians, Karen <[Milians.Karen@epa.gov](mailto:Milians.Karen@epa.gov)>  
**Subject:** RE: Quick question re: pyrifluquinazon

Steve,

Is the side-chain (as an individual compound) that results in giving pyrifluquinazon the PFAS classification considered PFAS? Does my question make sense? It is listed in toxics PFAS chemicals that it has done assessments?

Rochelle F. H. Bohaty, PhD, Acting Branch Chief  
Environmental Risk Branch 2  
Environmental Fate and Effects Division  
Office of Pesticide Programs  
U.S. Environmental Protection Agency

**From:** Wente, Stephen <[Wente.Stephen@epa.gov](mailto:Wente.Stephen@epa.gov)>  
**Sent:** Wednesday, March 9, 2022 1:02 PM  
**To:** Stephenson, Rachel S. <[stephenson.rachel@epa.gov](mailto:stephenson.rachel@epa.gov)>  
**Cc:** Nguyen, Khue <[Nguyen.Khue@epa.gov](mailto:Nguyen.Khue@epa.gov)>; Bohaty, Rochelle <[Bohaty.Rochelle@epa.gov](mailto:Bohaty.Rochelle@epa.gov)>  
**Subject:** RE: Quick question re: pyrifluquinazon

Because pyrifluquinazon meets the criteria as a PFAS ("forever") chemical, there was some discussion in one of the meetings about much of the pyrifluquinazon molecule degrading, but that we don't have any study indicating that the side-chain that gives pyrifluquinazon that PFAS designation actually degrades. If EPA wanted to know whether that side-chain breaks down, we could ask the registrant to conduct a special aerobic soil metabolism study in which that specific side-chain is radio-labeled. To me, the question would be if upper management wants to show that EPA is taking additional precautions with PFAS chemicals, then this additional requirement could be imposed on both pyrifluquinazon and broflanilide (the two registered PFAS pesticides). So, it is not something that EFED needs specifically for pyrifluquinazon to be able to do our risk assessment, but rather was just a suggestion for upper management to consider.

A good way to think about it is: EPA is making a claim that the data we have is sufficient to judge the persistence of these PFAS pesticides; that is true or false depending on whether you are talking about pyrifluquinazon or the PFAS part of pyrifluquinazon; therefore, does the Agency need to be able answer that question for the PFAS part of pyrifluquinazon, or not (i.e., is the PFAS designation important enough that the Agency needs that extra level of information).

**From:** Stephenson, Rachel S. <[stephenson.rachel@epa.gov](mailto:stephenson.rachel@epa.gov)>  
**Sent:** Wednesday, March 9, 2022 12:08 PM  
**To:** Wente, Stephen <[Wente.Stephen@epa.gov](mailto:Wente.Stephen@epa.gov)>  
**Cc:** Nguyen, Khue <[Nguyen.Khue@epa.gov](mailto:Nguyen.Khue@epa.gov)>  
**Subject:** Quick question re: pyrifluquinazon

Hi Stephen,

I just had a quick question for you regarding Pyrifluquinazon data. During our team meeting, we had discussed the possibility of asking for a radiolabeled study to round out the database. I recall that you had specifically spoken about this during the meeting, so I wanted to clarify with you what type of radiolabeled study EFED would need.

I'm asking because I plan on sending out the meeting notes today and wanted to be sure that I had the correct information in there before sending out to the team.

Thanks,

Rachel Stephenson  
Chemical Review Manager  
U.S. EPA/OCSP/PRD/RMIB 5  
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(202) 566-2363